

Statement of Basis

Heil Environmental
DeKalb County
Facility Number 703-0023

Introduction

This is a proposed renewal of an existing Title V Major Source Operating Permit. The original permit was issued on March 6, 2001. The current permit, the third renewal, expires on March 6, 2021. The application to renew this permit was received on August 31, 2020. The only change is the addition of Air Permit X007 for the CCI paint booth, which was issued on January 25, 2019.

Heil manufacturers garbage truck bodies and installs them on truck chassis at their facility in Fort Payne. The Standard Industrial Classification for the manufacture of truck bodies is 3713. This facility is not a potential major source of particulate matter, nitrogen oxides, sulfur dioxide, or carbon monoxide.

The following is a summary of sources, regulations, and periodic monitoring.

Main Paint Lines

On these two parallel paint lines, truck bodies are washed, primed, and painted. These lines are subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 subpart M MMM.

| Pollutants | Limitation | Regulations | Monitoring |
|------------|-------------------|-------------------------------|---------------------------------------|
| VOC | none | ADEM Code R. 335-3-14-.04 | Recordkeeping and semi-annual reports |
| HAPs | 2.6 lb/gal solids | ADEM Code R. 335-3-11-.06(90) | Recordkeeping and semi-annual reports |

Small Parts Booths

This permit unit is for two paint booths. A large offline paint booth near the two main paint lines and the smaller CCI paint booth. These booths are subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 subpart M MMM when paint guns are used, and are not subject when aerosol cans are used.

| Pollutants | Limitation | Regulations | Monitoring |
|------------|----------------------------------|-------------------------------|---------------------------------------|
| VOC | none | ADEM Code R. 335-3-14-.04 | Recordkeeping and semi-annual reports |
| HAPs | 2.6 pounds per gallon of coating | ADEM Code R. 335-3-11-.06(90) | Recordkeeping and semi-annual reports |

| | | | |
|--|--------|--|--|
| | solids | | |
|--|--------|--|--|

Quality Building

This unit consist of three paint booths used to paint trucks after the body has been installed. This line is subject to the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 subpart MMMM.

| Pollutants | Limitation | Regulations | Monitoring |
|------------|--|-------------------------------|---------------------------------------|
| VOC | none | ADEM Code R. 335-3-14-.04 | Recordkeeping and semi-annual reports |
| HAPs | 2.6 pound per gallon of coating solids | ADEM Code R. 335-3-11-.06(90) | Recordkeeping and semi-annual reports |

Emergency Generator

This emergency diesel generator near the office is subject to 40 CFR 63 Subpart ZZZZ. The emergency generator hours shall not exceed (add the actual hour requirements) and are recorded when maintenance is performed.

Monitoring of Emissions

Heil records the monthly paint usage for compliance with the HAP limits of subpart MMMM and for Title V fees. This is reported to the Department in the semi-annual reports.

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Notification of the proposal of this major source operating permit will be sent to all affected states bordering Alabama.

Recommendations

I recommend that the draft permit be issued to Heil following the required 30 public comment period and 45-day EPA review.

Hal Brock
Industrial Chemicals Section
Air Division

January 15, 2021
Date